EXHIBIT A

Letter from TSA received by Plaintiff, proven as essentially two months late (dated 27 December but received on 08 January, and untimely since due since 10 November 2017) from the deadline for Production by the Court (the first page of that Order follows TSA's letter). TSA'S PRODUCTION STILL DOES NOT MEET THE TSA SUBPOENA NOR THE COURT'S TWO ORDERS TO COMPEL PRODUCTION. Note also that no page counts or specific pages are listed, making it impossible to know if the ~10 pages received are supposed to correspond to previous TSA production, plus without any way to verify authenticity and non-SSI information not produced by TSA.

U.S. Department of Homeland Security
Transportation Security Administration
Office of Chief Counsel
3855 Lewiston Street, Suite 400
Aurora, CO 80011

Transportation Security Administration

December 27, 2017

Capt. J. Linlor
1405 S. Fern Street #90341
Arlington, VA 22202

Re: Production of materials containing Sensitive Security Information for purposes of litigating *Capt. James Linlor v. Michael Polson*, No. 1:17-cv-13-AJT-JFA (E.D. Va.)

Dear Captain Linlor:

Pursuant to Court orders entered in the above-referenced lawsuit regarding your conditional access to certain relevant Sensitive Security Information (SSI) for the limited purpose of litigating the case, [ECF Nos. 191, 225 & 246], the Transportation Security Administration (TSA) encloses herewith the materials containing SSI that are responsive to the subpoena served on TSA employee William Whetsell, [ECF No. 134], on October 9, 2017. The enclosed materials are as follows:

- Chapter 4 of Revision 11, Change 1, of TSA's Screening Checkpoint Standard Operating Procedures issued on December 8, 2015;
- the "Divestiture Officer" and "Standard Pat-Down" portions of Defendant Michael Polson's On-The-Job Training Checklist;
- responsive excerpts from TSA's New Hire Training Program Instructor Manual Version 3.1 issued on May 5, 2014; and
- responsive excerpts from TSA's Online Learning Center SOP Refresher Training Course issued on October 1, 2015.

The checklist, instructor manual, and training course were previously produced to you at Mr. Whetsell's deposition on October 20, 2017, with SSI redacted. These materials are enclosed here with no redactions. For your awareness, the information that TSA has designated as SSI is identified with red outlined boxes. No red outlined boxes appear on Chapter 4 of the Standard Operating Procedures because TSA has designated the entire Standard Operating Procedures as SSI in full; all portions of the Standard Operating Procedures must be protected as SSI, and no part of the document can be disclosed or made public in a filing on the Court's public docket.

Also enclosed is a copy of the Protective Order Regarding Sensitive Security Information [ECF No. 246] entered by the Court on December 21, 2017. Your possession and use of materials containing SSI produced to you in this case is governed

by the Protective Order, and you must comply with its terms. Please pay particular attention to the terms regarding the proper handling, storage, and transmission of materials containing SSI and the prohibition on disclosing SSI. Any submission or presentation of SSI to the Court must be made under seal and materials filed on the public docket must not contain SSI.

Please let me know if you have questions about any of the above. I can be reached at Nathan.Bryant@tsa.dhs.gov and 571-227-4497.

Sincerely,

//s//

Nathan Bryant
Attorney-Advisor
Office of Chief Counsel
Transportation Security Administration

Enclosures
Responsive materials containing SSI
Protective Order Regarding Sensitive Security Information [ECF No. 246]

cc: D'Ontae Sylvertooth
Special Assistant United States Attorney
Attorney for Defendant Michael Polson